

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

VISA INC.,

Defendant.

Case No. 1:24-cv-07214-JGK-SLC

JOINT STATUS REPORT

Pursuant to the Joint Amended Scheduling and Case Management Order (ECF Nos. 97, 100), the parties provide the following joint status report as to their negotiations regarding the data to be produced by Visa in discovery and appropriate deadlines for production. *Id.* ¶ 9.

By way of background, the United States has served on Visa multiple requests for production that seek large quantities of electronic data. Among these requests are (a) one request (RFP 35) for debit network data underlying Visa’s Global Business Intelligence (“GBI”) tool, and (b) three requests (RFPs 38, 39, and 40) for Debit Processing Service (“DPS”) data. The parties are working to resolve their negotiations as to the scope of data Visa will produce in response to these requests.

The parties are pleased to report that they have concluded their discussions as to the scope and timing of Visa’s DPS-related data productions. Visa will produce a first batch of DPS data responsive to RFPs 38, 39, and 40 covering the period through June 30, 2025, by end of September 2025, and a second batch of DPS-related data covering the period from July 1, 2025 through September 30, 2025, by end of November 2025.

The GBI-related data request requires additional work for collections, including preparing specific coding to extract the data and iterative production of samples of data to Plaintiff for consideration. The parties are making progress on their discussions concerning GBI-related data and continue to refine the scope of data to be provided. The United States has identified six categories of GBI-related data for production, and within each of those categories, has identified particular data fields it seeks. Visa has objected to certain of the United States' initial requests on the grounds of relevance and burden. Reserving all rights as to these claims, the United States has narrowed certain of those requests to address Visa's objections and the difficulties that Visa asserts are associated with the extraction of large data sets from Visa's system and is working with Visa to resolve any disputes. Visa has provided sample reports related to three of the six categories.¹ Visa is currently working on additional sample reports for the three remaining categories of data. The parties will continue to negotiate and update the Court by September 5, 2025 as to the status of their conversations.

DATED: August 13, 2025

Respectfully submitted,

/s/ Michele Trichler

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¹ The Division is reviewing the samples and working with Visa to resolve any potential issues.

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